



# FACILITY COMPLIANCE AUDIT REPORT

## Division of Waste Management Solid Waste Section

<b>UNIT TYPE:</b>										<b>COUNTY: Forsyth</b> <b>PERMIT NO.: 34-19</b> <b>FILE TYPE: COMPLIANCE</b>		
Lined MSWLF		LCID		YW		Transfer		Compost			SLAS	
Closed MSWLF		HHW		White goods		Incin		T&P	X		FIRM	
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO			SDTF	

**Date of Audit:** August 7, 2009

**Date of Last Audit:** January 27, 2009

**FACILITY NAME AND ADDRESS:**

Lowder Recycling and Disposal LLC Treatment and Processing Facility  
 2810 Griffith Road  
 Winston-Salem, NC 27103

**GPS COORDINATES:** N: 36.0367 E: -80.3136

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Eugene Lowder - Owner  
 w: 336-760-0477  
 f. 336-760-6640  
 rmayhew@lowderinc.com

**FACILITY (OFFICE) CONTACT ADDRESS:**

2840 Griffith Road  
 Winston-Salem, NC 27103

**AUDIT PARTICIPANTS:**

John Patrone, NCDENR – Solid Waste Section (SWS)  
 Marlene Oakley, Administrative Assistant  
 Billy Keiger, Maintenance Supervisor (bkeiger@lowderinc.com)  
 Michael Young, Operator

**STATUS OF PERMIT:**

Permit To Operate (PTO) issued June 30, 2004  
 PTO expired July 1, 2009  
 PTO application received by SWS on August 6, 2009 (PTO application is currently under review)

**PURPOSE OF AUDIT:**

Comprehensive Audit

**NOTICE OF VIOLATION(S):**

None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

**STATUS OF PAST NOTED VIOLATION(S):**

None

**FACILITY COMPLIANCE AUDIT REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

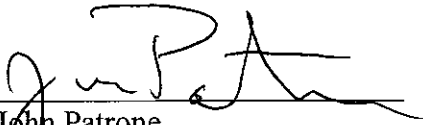
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**AREAS OF CONCERN AND COMMENTS:**

On August 7, 2009, John Patrone met with Marlene Oakley, Billy Keiger, and Michael Young to conduct a comprehensive audit of the Lowder Recycling and Disposal LLC Treatment and Processing facility in Winston-Salem, Forsyth County.

1. The facility site plan and operations plan were reviewed.
2. The facility is a permitted Treatment and Processing (T&P) facility. It accepts land clearing debris. The facility produces mulch and screened topsoil that is sold to the general public.
3. Topsoil is obtained from stumps and collected as "leftovers" from piles of land clearing debris.
4. Facility throughput is ~ 800 to 1,200 lbs/month. Facility throughput of land clearing debris for July 2005 through June 2006 was 14,433.30 tons, July 2006 through June 2007 was 14,525.70 tons, July 2007 through June 2008 was 2,121.70 tons, and July 2008 through June 2009 was 1,624.70 tons.
5. Mr. Keiger estimates that the average single axel truck contains 0.5 tons of land clearing debris and that the average tandem axle truck contains 2 to 3 tons.
6. The facility is required to maintain temperature records of the mulch piles ensuring that the temperature does not exceed 110° F. Temperature records for 2009 (to-date) were verified. The facility took temperature readings on: January 15<sup>th</sup>, March 14<sup>th</sup>, and June 24<sup>th</sup>. Temperature readings were taken at three locations per windrow. All temperature readings were  $\leq$  110° F.
7. During the inspection the facility had one row of land clearing debris (~ 150' x 20' x 20') and four windrows of mulch (each ~ 150' x 12' x 10'). The windrows appeared well maintained. The facility is required to limit windrow width and height and turn them frequently. The facility has been informed that if windrow temperatures commonly exceed 110° F it may have to obtain a Type 1 Solid Waste Compost permit.
8. The facility maintained fire lanes between windrows.
9. Un-permitted waste is collected and separated accordingly and brought to an approved solid waste disposal facility. Scrap metal is stored on-site and sold in bulk.
10. The facility is reminded to remove unpermitted material from land clearing debris when received, and ensure it is not ground.
11. The facility appeared to meet the required 50 foot property line buffers.
12. There was no indication of soil erosion or runoff.
13. Proper signage was posted at the facility entrance. However, it must be properly affixed.
14. The site is secured by a gate.

Please contact me if you have any questions or concerns regarding this audit report.

  
John Patrone  
Environmental Senior Specialist  
**Regional Representative**

Phone: 336-771-5095 Fax: 336-771-4631

Delivered on : <u>August 13, 2009</u> by		Hand delivery	<input checked="" type="checkbox"/>	US Mail		Certified No. [ ]
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cc: Mark Poindexter, Field Operations Branch Supervisor  
Jason Watkins, Central Regional Supervisor  
Donald Herndon, Compliance Officer  
Michael Scott, Composting & Land Applications Branch Head